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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
REPLY IN SUPPORT OF MOTION
REGARDING FRAUDULENT PLAINTIFF
FACT SHEETS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer
4 this Declaration in the above-captioned matter in support of Uber’s Reply in Support of its Motion
5 Regarding Fraudulent Plaintiff Fact Sheets.
6

7 2. Attached as **Exhibit 1** is a true and correct copy of the Defendant Fact Sheet for MDL ID
8 3207, served April 23, 2025.

9 3. Attached as **Exhibit 2** is a true and correct copy of the Defendant Fact Sheet for MDL ID
10 3207 DFS, served September 26, 2025.

11 4. Attached as **Exhibit 3** is a true and correct copy of the Amended Ride Information Form
12 for MDL ID 3207, served July 23, 2025.
13

14 5. Attached as **Exhibit 4** is a true and correct copy of the Amended Plaintiff Fact Sheet for
15 MDL ID 3207, served August 8, 2025.

16 6. Exhibits 3 and 4 provided information not previously provided in MDL ID 3207’s initial
17 Ride Information Form and Plaintiff Fact Sheet.

18 7. Attached as **Exhibit 5** is a true and correct copy of the PFS for MDL ID 2774 served
19 January 30, 2025.
20

21 8. Attached as **Exhibit 6** is a true and correct copy of the Notice of Deficiencies for MDL
22 ID 2774 dated July 7, 2025.

23 9. For MDL ID 3773, the Plaintiff at issue in ECF 4585, Kherkher Garcia LLP served a
24 Ride Information Form on Uber on this Plaintiff’s behalf on July 29, 2025.

25 10. For MDL ID 3773, the Plaintiff at issue in ECF 4585, Kherkher Garcia LLP served a
26 Plaintiff Fact Sheet on Uber on this Plaintiff’s behalf on August 17, 2025.
27
28

11. For MDL ID 3773, the Plaintiff at issue in ECF 4585, Kherkher Garcia LLP served an Amended Plaintiff Fact Sheet on Uber on this Plaintiff's behalf on October 4, 2025.

12. For MDL ID 3433, the Plaintiff at issue in ECF 4698, Kherkher Garcia LLP served a Plaintiff Fact Sheet on Uber on this Plaintiff's behalf on June 20, 2025.

13. For MDL ID 3433, the Plaintiff at issue in ECF 4698, Kherkher Garcia LLP served an Amended Plaintiff Fact Sheet on Uber on this Plaintiff's behalf on August 27, 2025.

14. Uber notified Kherkher Garcia that the Plaintiff Fact Sheet described in paragraph 12 was, among other things, not verified and therefore deficient on July 28, 2025.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: December 27, 2025

Respectfully submitted,

By: /s/ Christopher V. Cotton

Christopher V. Cotton (admitted *Pro Hac Vice*)

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FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: December 27, 2025

/s/ Laura Vartain Horn
Laura Vartain Horn